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US EPA RECORDS CENTER REGION 5



November 30, 1994

Dr. Leah Evison  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Re: Albion-Sheridan Landfill Superfund Site, Albion, MI  
Comments to Proposed Plan**

Dear Dr. Evison:

The following comments to the EPA's proposed plan published October 3, 1994, are submitted by Cooper Industries, Inc. pursuant to an agreed extension of time.

Landfill Cap

1. Section 4.2.3 of the September 1994 report entitled "Final Presumptive Remedy / Feasibility Study Report" (Report) recommends a 40 mil VLDPE or 30 mil PVC flexible membrane liner (FML). Cooper suggests the Agency consider allowing parties the option of installing a sturdier FML, such as 60 mil HDPE.
2. Figure 3.3 indicates that the 6" sand drainage layer will be placed above the 18" cover soil. Cooper suggests that the two layers be interchanged, allowing the more conductive sand layer to rest directly upon the FML, thereby ensuring maximum drainage.

Additionally, Cooper is evaluating whether the 30" depth to the flexible membrane liner is sufficient to prevent rupture during Michigan freeze/thaw cycles, and requests the Agency consider allowing parties the option to increase the depth of the FML by providing a thicker cover, if warranted.

3. Figure 3.2 gives general contours of the proposed cap area. Cooper suggests that "cut and fill" regrading of the topographic contours (i.e., the 990' contour on the western edge of the landfill) will reduce cap materials volumes, and result in less steep and more stable sideslopes. Cooper requests flexibility in the contour design to accommodate this potential savings of materials.

Additionally, regrading at the southern end of the landfill could minimize any impact upon the private residence just to the south of the site.

#### Landfill Gas Management

EPA states that the passive venting points be installed first, at locations presented in Figure 3.9, with active gas collection to be added only if vented concentrations exceed EPA or MDNR criteria. Cooper concurs with the EPA proposal.

#### Additional Remedial Investigation Activities

The Report is silent regarding supplemental remedial investigation activities. However, during a meeting held in Chicago on November 7, 1994, you mentioned the need for two additional nested monitoring well pairs (shallow/deep bedrock) and a single deep bedrock well to be installed during the remedial design phase of the project. Cooper believes that the current monitoring well network and associated compliance monitoring at the site is sufficient to determine the effectiveness of the cap to prevent leaching to groundwater and to ensure there is no potential impact to domestic water supplies.

#### Analytical Methodologies and Associated Detection Levels

The Final Presumptive Remedy / Risk Assessment Report does not identify which analytical methods are to be utilized for the quarterly and annual groundwater monitoring well compliance sampling detailed in Figure 3.4.

Section four of the RI Report (April 1994) states that the samples were analyzed for the TCL organic (VOC, SVOC, and pesticides/PCBs) and the TAL inorganic (including total metals and cyanide) analytes and that residential wells, surface water samples, and selected groundwater monitoring well samples were analyzed using the "Region 5 Residential Well SAS" for organic and inorganic compounds. No laboratory contacted by Cooper was familiar with the "Region 5 Residential Well SAS." Cooper requested and has been supplied with the analytes of concern and associated detection levels, but that information is still not specific enough regarding the "Region 5 Residential Well SAS" protocols to allow comment by Cooper.

Cooper suggests that TAL/TCL be utilized to collect the initial analytical sample for any newly installed well, with subsequent quarterly and annual testing to be for only those analytes of concern to Cooper and the Agency. For residential wells, it is suggested that a gas chromatograph (GC) methodology (such as EPA Methods 601/602 for VOCs), which has lower detection levels than a typical GC/MS method

and is a more standard methodology, be utilized rather than the Region 5 Residential Well SAS.

Drum Removal

Cooper concurs with the Agency that drums containing unidentified liquids and solid hazardous waste which are discovered during the remedial action will be properly disposed. Cooper concurs further with the Agency's proposal that other discovered drums that contain dry non-hazardous solids be covered by the cap because they do not pose a threat to groundwater.

Please contact me if you have questions about any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher L. Smith", with a long horizontal line extending to the right.

Christopher L. Smith  
Senior Project Manager

K:94NOV002.CLS

cc: Ceil Price  
M. J. O'Brien  
R. H. Uber  
Barbara Wester, EPA Region V, ORC  
Heidi Valetkevitch, OPA (P-19)